

EXHIBIT

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UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS

WILLIAM G. STEVENS,

Plaintiff,

v.

Civil Action No. 04-11938JLT

ROBERT HOWLAND, et al.,

Defendant.

RESPONSE OF PLAINTIFF WILLIAM G. STEVENS  
TO DEFENDANT'S FIRST SET OF INTERROGATORIES

**GENERAL OBJECTIONS AND RESERVATIONS**

1. Plaintiff objects to these interrogatories to the extent that they seek the disclosure of information not required under the Federal Rules of Civil Procedure.

2. Plaintiff objects to these interrogatories as unduly burdensome and oppressive insofar as they seek information in the defendants' possession, custody or control.

3. Plaintiff's responses to these interrogatories shall not be deemed to constitute an admission that any particular document exists, is relevant, or is admissible as evidence or that the subject matter of the request is relevant to litigation.

4. Subject to and without waiving any of his objections, plaintiff reserves the right to supplement these responses, as needed, should he later obtain additional, responsive, information.

**INTERROGATORY RESPONSES**

**INTERROGATORY NO. 1**

Please identify yourself, giving your full name, date of birth, and social security number.

**ANSWER NO. 1**

Plaintiff states, William G. Stevens, March 1, 1965, and

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institution chaplains should make reasonable efforts to insure that an accredited representative of an inmates religious faith is available to provide formal or informal services to inmates who so request wherever the inmate is confined within the institution."

**INTERROGATORY NO. 9**

For each defendant, please describe in detail the basis of the claim that he/she interfered with your free exercise of religion. For each defendant, please describe each and every specific instance which support the claim that he/she acted to obstruct your ability to practice your religious beliefs, including for each specific instance: the date and time, location, the specific religious practice involved, the identity of all individuals present at the time of the obstruction, what was said by the defendant and you in chronological order, and the period of time the obstruction of the specific religious practice lasted. Include within your response a description of any and all writings, letters, memos or notes from you to each defendant regarding each specific instance of obstruction of your religious practices.

**ANSWER NO. 9**

Plaintiff objects to this interrogatory on the grounds that it is vague, unduly burdensome, and overly broad. Subject to and without waiving said objections, plaintiff states that the information sought in this interrogatory is within the defendants possession and control.

**INTERROGATORY NO. 10**

If you allege that you have been denied adequate space

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for Wiccan corporate worship at the Treatment Center, please describe in detail the basis for your claim. Also, describe in detail the harm you allege you have suffered do to a lack of adequate space for Wiccan corporate worship.

**ANSWER NO. 10**

Wicca is a religion of nature worship, and as such Wiccan rituals, rites, and celebrations are typically preformed outside, weather permitting. Before any ritual or rite is conducted, an appropriate area must be prepared. This is known as Casting the Circle. In Wicca, most of our work is done within the confines of the circle. The circle needs to be large enough in diameter to accomodate all the various objects, tools, and instruments as well as the people involved in the ritual or rite. A Coven of up to about six people will need to be able to cast a circle of nine to twelve feet in diameter. Wiccans at the Treatment Center are not allowed an outdoor worship site and the dimentions of the indoor space do not allow the casting of a Sacred Circle of a large enough diameter to accomodate the people who wish to attend, there-by severely limiting the activities possible. The harm suffered has been the loss of the ability to engage in the religious practices that I feel are necessary to being a good Wiccan. These same activities were available to me at N.C.C.I. Gardner (also a Level 4 facility).

**INTERROGATORY NO. 11**

If you allege that you have been denied adequate time for Wiccan corporate worship at the Treatment Center, please describe in detail the basis for your claim. Also, describe in detail the harm you allege you have suffered due to a lack of adequate